



experiences with BMW/mini automobiles, would those experiences and your feelings in any way color or impact your feelings towards the defendant in this case?

5. Do any of you have negative feelings towards imported car manufacturers and/or importers/distributors and/or imported car dealerships? If yes, please explain.

6. Would the fact that the defendant in this matter sells imported vehicles in any way color or impact your feelings towards the defendant?

7. Does the fact that the plaintiff in this case is an individual and the defendant is a corporation/business cause you to believe that you will not be able to view this case in a fair and impartial manner?

8. Have you or any immediate family members ever been employed by an automobile manufacturer and/or an automobile importer/distributor and/or an automobile dealership or service facility? If yes, name the company or dealership and state what position in which you or your immediate family members were employed.

9. During the trial, the plaintiff will have the opportunity to present her case to you first and the defendant will have an opportunity to present its case afterwards – will you wait until all of the evidence is in before deciding the case?

10. Just because the plaintiff has filed a lawsuit against defendant does not mean that she is entitled to recovery here, does it?

11. Will you require the plaintiff to prove her case by a preponderance of the evidence and follow the instructions the Judge gives you?

Dated: September 10, 2012

/s/ Rachel Elsby  
Rachel Jane Elsby (VSB #81389)  
BUCHANAN INGERSOLL & ROONEY, PC  
1737 King Street, Suite 500  
Alexandria, Virginia 22314-2727  
Telephone: 703-299-6927  
Facsimile: 703-836-2021  
rachel.elsby@bipc.com

James DeRose, *pro hac vice*  
Anne Burris, *pro hac vice*  
LINDABURY MCCORMICK ESTABROOK &  
COOPER, PC  
53 Cardinal Drive, PO Box 2369  
Westfield, NJ 07091  
Telephone: 908-233-6800  
Facsimile: 908-233-5078  
jderose@lindabury.com  
aburris@lindabury.com

*Counsel for Defendant BMW of NA, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of September 2012, I electronically filed the foregoing DEFENDANT'S PROPOSED *VOIR DIRE* with the Clerk of Court using the CM/ECF system which will send notification of such filing via Notification of Electronic Filing (NEF) to the following:

Leonard A. Bennett, Esq.  
Susan Rotkis, Esq  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Blvd., Suite 1-A  
Newport News, VA 23601  
srotkis@clalegal.com  
lenbennett@clalegal.com  
Phone: 757-930-3660  
Fax: 757-930-3662

/s/ Rachel Elsby  
Rachel Jane Elsby (VSB #81389)  
BUCHANAN INGERSOLL & ROONEY, PC  
1737 King Street, Suite 500  
Alexandria, Virginia 22314-2727  
Telephone: 703-299-6927  
Facsimile: 703-836-2021  
rachel.elsby@bipc.com

*Counsel for Defendant BMW of NA, LLC*